

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS (CORPUS CHRISTI)**

In re:

J.C. Penney Company, Inc., *et al.*,

Debtor.

Chapter 11

Case No. 20-20182 (DRJ)
(Jointly Administered)

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF DOCUMENTS

PLEASE TAKE NOTICE THAT, pursuant to Rules 2002(g) and 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and section 1109(b) of title 11 of the United States Code, 11 U.S.C. § 101 *et seq.* (“Bankruptcy Code”), counsel listed below enters their appearance as counsel to Nike USA, Inc. (the “Client”). Counsel requests that they be added to the official mailing matrix and service lists in these cases and that copies of all pleadings, motions, notices, and other papers, filed or served, in these cases or any proceeding herein, be served upon the below-listed counsel at the following mailing or e-mail addresses or facsimile numbers:

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PLEASE TAKE FURTHER NOTICE THAT, pursuant to section 1109(b) of the Bankruptcy Code, the foregoing request includes not only the notices and papers referred to in the above-mentioned Bankruptcy Rules, but also includes, without limitation, all orders and notices of applications, motions, petitions, pleadings, requests, complaints, disclosure statements, plans, or demands, whether formal or informal, written or oral or transmitted or conveyed by mail delivery, telephone, telegraph, or otherwise, in these cases.

This Notice of Appearance and any subsequent appearance, pleading, claim, or suit are not intended as, nor shall be deemed, a consent to or waiver of the Client's: (i) right to have final orders in non-core matters entered only after de novo review by a district judge; (ii) right to trial by jury in any proceeding so triable herein or in any case, controversy, or proceeding related hereto; (iii) right to have the reference withdrawn by the United States District Court in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claim, actions, defenses, setoffs, or recoupments to which the Client is or may be entitled under any agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments expressly are reserved.

Dated: May 18, 2020

A.M. SACCULLO LEGAL, LLC

/s/ Anthony M. Saccullo

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